

Privacy Statement

(last updated: May 20, 2021)

Responsible organization

SmartFin Management BV, having its registered office at 1040 Brussels, Priester Cuypersstraat 3 and with company number 0737.561.076

hereinafter "**SmartFin**"

is responsible for the processing of personal data as shown in this privacy statement. (Contact details: Tel: +32 15 28 78 80, e-mail: info@smartfincapital.com, website: www.smartfinvc.com)

Privacy Policy of SmartFin

This privacy statement sets out our privacy policy in relation to the use of our website www.smartfinvc.com. By using the website, you agree to this privacy statement.

Most of the information on our website is available without the need to provide personal data. In certain cases, it happens that you provide us with certain personal data. This could occur, for example, in the following cases (non-exhaustive):

- Reporting of investment opportunities;
- Subscribing to news items;
- Communicate CV with a view to an internship or vacancy;
- Contact us to find out more about our operations or about a particular participation;
- Registration for an event.

The use of this information will be limited to what is necessary to answer your request and will only be used in the context of a strict follow-up of your request.

Legal basis for processing personal data

SmartFin may use your personal data:

1. on the basis of your consent to the processing for the purposes set out above in this Statement. You may withdraw your consent at any time. (See *infra*.)
2. to the extent that this is necessary for the performance of a contract that you would have entered into with SmartFin would have concluded with SmartFin or, at your request, to be able to take the necessary steps to an agreement with us.
3. when this is necessary for the advancement of our legitimate interests, to the extent that this outweighs your interests and rights.

Rights of the data subject

In accordance with the European and Belgian regulations regarding the processing of personal data and the free movement of such data, you have the right to inspect, correct and delete your personal data processed by SmartFin free of charge. You may also oppose, at any time and free of charge, the processing of your personal data for direct marketing purposes.

In this regard, please forward your written, dated and signed request/opposition to info@smartfinvc.com and attach a copy of your identity card.

Your personal data will be kept for as long as necessary to achieve the intended purposes.

Processing of anonymous or aggregated data and the use of cookies

SmartFin may also process anonymous or aggregated data, such as browser type or IP address, the date and time you visit our website, the location from which you visit our website, which sub-pages of our website you visit, the operating system you use or the domain name of the website through which you came to www.smartfinvc.com, or through which you leave it. This enables us to continuously optimize our website for users.

We use "cookies" when you visit our website. A "cookie" is information sent to your Internet browser by the Internet server and stored on your computer's hard drive. Cookies make it possible for us to recognize your computer when you use it again to visit our website. In this way, they allow us to make our website more user-friendly for you and provide you with a more personalized service.

You may decide to refuse the use of cookies if your Internet browser provides this option, but such refusal may possibly affect the use you can make of our website and certain applications on our website.

All data that we collect through the use of cookies will be treated confidentially.

Passing on your personal data to third parties

The personal data you share with us will not be passed on to third parties, unless within the explicit consent given for this purpose or unless we would be legally obliged to do so (for example, if the police would request access to personal data in the case of a suspected crime).

Security of your data

SmartFin undertakes to take all reasonable technical and organizational measures to secure your data, and to reduce as far as possible the risk of improper access or loss of your data. In this regard, your personal data may be transferred to service providers (e.g., website hosting, data backup) located in a country outside the EU.

Intellectual property rights

The contents of this website, including logos, images, drawings, texts, product or company names, are protected by intellectual rights and belong to SmartFin or entitled third parties.

Links to other websites

Our website may contain links to other websites. If you use these links to leave our website, you should note that we have no control over those other websites. Therefore, we cannot be responsible for the protection of

your data and privacy while you are visiting such sites and such sites are not governed by our data protection and privacy statement. You should therefore exercise due care and look at the privacy statement applicable to each such website.

Complaints

If you have any complaints or questions about our compliance with our legal obligations regarding the protection of your data and privacy or have any questions in this regard, please contact us at info@smartfinvc.com.

If you believe that we have not taken appropriate action on your complaint, you have the right to complain to the Belgian Data Protection Authority. More information on how to do this can be found at www.gegevensbeschermingsautoriteit.be.

Amendment of this Statement

SmartFin reserves the right to modify this Statement at any time and unilaterally. By continuing to visit our website, you agree to be bound by the amended Statement where applicable.